

BEFORE THE

POSTAL RATE COMMISSION WASHINGTON, DC 20268-0001

AUG 6 11 46 ÅH '98

MAILING ONLINE SERVICE

Docket No. MC98-1

DOUGLAS F. CARLSON INTERROGATORIES TO UNITED STATES POSTAL SERVICE WITNESS LINDA WILCOX (DFC/USPS-T7-1-2)

August 3, 1998

Pursuant to sections 25 and 26 of the *Rules of Practice*, I, Douglas F. Carlson, hereby submit interrogatories to United States Postal Service witness Linda Wilcox.

If the witness is unable to provide a complete, responsive answer to a question, I request that the witness redirect the question to a witness who can provide a complete, responsive answer. In the alternative, I request that the question be redirected to the Postal Service for an institutional response.

The instructions contained in my interrogatories to witness Garvey (DFC/USPS-T1-1-6) are incorporated herein by reference.

Respectfully submitted,

Dated: August 3, 1998

DOUGLAS F. CARLSON

DFC/USPS-T7-1.

Please refer to your testimony at page 2, lines 14–16.

- a. Did you receive a comparable number or percentage of returned newsletters when you mailed your newsletter without using Mailing Online service?
- b. Please explain why Mailing Online did not correct some or all of these addresses before it mailed your newsletter. (If necessary, please consult with a postal employee to develop an answer to this question.)
- c. Compared to mailing the newsletters manually without using Mailing Online, please explain how Mailing Online helped you purge the list of bad addresses.

DFC/USPS-T7-2.

- a. Please refer to your testimony at page 3, line 12. Please explain some of the "kinks" that must be "worked out."
- b. Do you know for a fact that the Postal Service has agreed to fix every problem that you would describe as a "kink"?

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with section 12 of the *Rules of Practice*.

DOUGLAS F. CARLSON

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August 3, 1998 Emeryville, California